Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Administration of the	)	CC Docket No. 92-237
North American Numbering Plan	)	Phase I
	)	

U S WEST COMMENTS

The Commission seeks comments concerning "the costs and feasibility of local number portability."[1] In requesting this information, however, the Commission may not be aware that several types of local number portability are already available to most telephone users today. For example, over 65,000 U S WEST Communications customers currently use remote call forwarding, a capability that can be used in achieving one form of number portability. Cellular carriers are also beginning to provide automatic call delivery services, which provide yet another form of number portability.

U S WEST cannot meaningfully respond to the Commission's inquiry because the phrase, "local number portability," is a generic term that is used to refer to different capabilities. A business desiring to change its serving telephone company, for example, will likely attach a different meaning to the phrase than a person who wants to continue receiving his calls while traveling to a distant location. A common understanding of this term is important because different technologies and network architectures

[1] Notice of Inquiry, 7 FCC Rcd 6837, 6842 at ¶ 41 (Oct. 29, 1992).

may be required to provide different forms of local number portability (each of which involves different implementation issues and costs).

A. Portability Defined. The term, "portability," is a generic concept that is often used to refer to a variety of similar, yet different situations. Number portability can be used to describe at least four different situations:

1. Number Retention. The most basic form of number portability is number retention, whereby all calls are directed to a single location (*e.g.*, a home or business), but the customer can change his serving switch (including serving carrier) without having to change his telephone number. Remote call forwarding is an existing service that can be used to provide number retention.

2. Static Portability. Static portability is a more robust method of number retention. With static portability, a customer can still change his serving switch without having to change his telephone number, but the customer also has some flexibility to change the destination of his incoming calls (*e.g.*, to one's office during the day and one's home during the evening). The time-of-day routing features of 800 data bases are an example of static number portability.

3. Terminal Number Mobility. With terminal mobility, a telephone number is assigned to a particular piece of terminal equipment (*e.g.*, cellular telephone, laptop computer) rather than a rather than to fixed point like a home or business. Terminal mobility is thus a more robust method of number portability than number retention or static mobility because calls can be routed dynamically,

to a person's CPE regardless of its location at the time of the call. The automatic call delivery services now being introduced by cellular carriers are an example of terminal number mobility.

4. Dynamic (or Complete) Number Portability. The limitation of terminal number portability is that, because the telephone number is assigned to a particular piece of equipment, a person will receive incoming calls only so long as the person has this particular CPE in his possession. With dynamic (or complete) number portability, telephone numbers are instead assigned to people and calls to a portable number are directed to the person assigned the number — regardless of the person's physical location, regardless of the CPE available to the person at the time of the incoming call, and regardless of the service provider. One form of dynamic number portability is being addressed in industry fora in connection with personal communications services.

B. Local Defined. An informed discussion of local number portability further requires consensus over what is meant by the term "local." Local is often used to refer to a traditional exchange (or non-toll) area, but it may also mean a single metropolitan area (*e.g.*, a cluster of switches connected by a fiber ring). The word "local" is, moreover, sometimes used to refer to a Numbering Plan Area (NPA or area code) or to a LATA.

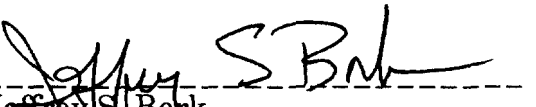
Agreement over the meaning of the word "local" is important because different methods may be required to provide portability depending upon the geographic area involved. For example, if "local" is defined as a single NPA, switches could provide number portability by screening the lo-

cal seven-digit telephone number. In contrast, if "local" is defined as an area larger than a single NPA, then the provision of number portability will require a telephone network to screen all 10 digits of a telephone number. These differences can impact equipment requirements (*e.g.*, capacity), available network architectures (*e.g.*, where the function of locating the called party's serving switch is performed), network performance (*e.g.*, call processing times) and, as a result, implementation costs.

The Commission has expressed an interest in learning the costs and feasibility of local number portability. However, these subjects cannot be meaningfully addressed without first knowing what is meant by the phrase, local number portability. Consequently, the Commission should consider referring this matter to relevant industry forums so that a set of useful definitions, agreed to by the entire industry, can be developed and so that the Commission can thereafter obtain the information it seeks.

Respectfully submitted,

U S WEST, Inc.



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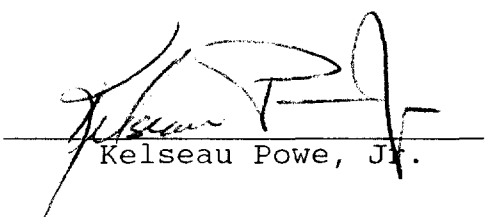
CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify on this 28th day of December, 1992, that I have caused a copy of the foregoing **U S WEST COMMENTS** to be hand delivered to the persons named on the attached service list.



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